

Aberdeen City Council

From: [EPConsultations](#)
To: [MD Marine Renewables](#)
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023
Date: 20 December 2023 17:00:50
Attachments: [image001.png](#)
[image002.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image003.png](#)
[image005.png](#)

Dear Kate,

Thank you for getting in touch. We have no comments in relation to this application.

Kind regards
Sue

Sue Cumming BSc (Hons) MSc MCIEEM | Senior Environmental Planner (Biodiversity & Open Space)

Protecting the irreplaceable. Promoting the sustainable

Aberdeen City Council | Climate and Environment Policy | Strategic Place Planning | Commissioning | Ground Floor North | Marischal College | Broad Street | Aberdeen | AB10 1AB

Teams Telephony: 01224 069399 | Mobile: [REDACTED] | Switchboard: 01224 523470
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**Aberdeen
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**SUSTAINABLE
DEVELOPMENT
GOALS**



Planning Authority of the Year: Aberdeen City Council

Best Plan: [Net Zero Aberdeen Routemap](#)

From: [Robert Forbes](#)
To: [MD Marine Renewables](#)
Cc: [PI](#); [Matthew Easton](#)
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023 : Mail ID ref. 47079
Date: 20 December 2023 14:32:14
Attachments: [image001.png](#)
[image002.png](#)

Good afternoon

I refer to the above matter.

Apologies for the delay in responding to your email of 03/11/24 which has been passed to me for comment.

I can advise that, due to the considerable distance which this project would be from the coast and the City boundary (in excess of 75km), and the absence of any associated proposed onshore infrastructure within this Council area, ACC have no comments to make on the project.

I note that the location of the cable landfall appears to be uncertain at this stage and would recommend that the impact of that and all associated onshore works are considered within the scope of the EIA associated with the project. I presume that the impact of the development on ornithology will be assessed by relevant experts / consultees.

I trust that this is of assistance.

Yours sincerely

Robert Forbes MRTPI
Senior Planner

Development Management
Strategic Place Planning
Aberdeen City Council
Business Hub 4
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AB10 1AB

T: 01224 067942

M: [REDACTED]

E: rforbes@aberdeencity.gov.uk

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Aberdeenshire Council

From: [Stuart Newlands](#)
To: [MD Marine Renewables](#)
Cc: [SDDT.Planning](#)
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Local Authorities - Response required by 18 December 2023 (Our Ref: ENQ/2023/0240)
Date: 11 December 2023 14:14:17
Attachments: [image002.png](#)
[image004.png](#)
[image003.png](#)

Good Afternoon,

I write in response to the above to confirm that having consulted with our internal Ecologist, Aberdeenshire Council have no comment to make on the additional information submitted relation to this consultation.

Kind Regards,

Stuart Newlands
Planner – Strategic Development Delivery Team
Planning and Economy
Environment and Infrastructure Services
Aberdeenshire Council
Skype : 01467 539834
E-Mail: stuart.newlands@aberdeenshire.gov.uk

Please note normal working hours-Monday to Friday 9am- 5pm

Please remember to submit all planning applications, including revised drawings and additional supporting information via the [National ePlanning Portal](#)

Website: <https://www.aberdeenshire.gov.uk/planning/>

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Freedom of Information request: Please send your enquiry to foi@aberdeenshire.gov.uk



Angus Council

From: [Stephanie G Porter](#)
To: [MD Marine Renewables](#)
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Local Authorities - Response required by 18 December 2023
Date: 16 November 2023 14:34:19
Attachments: [image001.png](#)
[image002.png](#)

Dear Sir/Madam,

**ELECTRICITY ACT 1989
MARINE (SCOTLAND) ACT 2010
MARINE AND COASTAL ACCESS ACT 2009**

**APPLICATION TO CONSTRUCT AND OPERATE GREEN VOLT OFFSHORE
WINDFARM, EAST OF ABERDEENSHIRE COAST**

I refer to your email below, and having reviewed the additional submitted information, I can confirm Angus Council has no new/further comments to make.

Yours sincerely,

Stephanie Porter | Team Leader – Development Standards | Planning & Sustainable Growth | Angus Council | Angus House | Orchardbank Business Park, Forfar, DD8 1AN | (01307 492378)

Covid: As restrictions ease, the emphasis will continue to be on personal responsibility, good practice and informed judgement. [Get the latest information on Coronavirus in Scotland.](#)

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BT

From: radionetworkprotection@bt.com
To: [MD Marine Renewables](#)
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023 WID12091
Date: 28 December 2023 12:08:24
Attachments: [image001.png](#)
[image003.png](#)
[Green Volt Offshore Wind Ltd Section 36 Consent and Marine Licences Green Volt Offshore Windfarm East of Aberdeenshire Coast Consultation Response Required by 05 March 2023 WID12091.msg](#)

Good afternoon Kate

Thank you for your e-mail

Having studied the additional information our response is nil, and remains the same as the original correspondence on 15/02/23

Kind regards

Chris

Caledonia Offshore Wind Farm and supporting information



18 December 2023

Ref: UKCAL-CWF-CON-STK-LET-00004

Marine Directorate

Licensing Operations Team

375 Victoria Road

Aberdeen

AB11 9DB

By email: md.marinerenewables@gov.scot

Green Volt Offshore Wind Farm Ltd – Section 36 Application

Representation by Caledonia Offshore Wind Farm

Dear MD-LOT,

Thank you for the opportunity to comment on the Additional Information Application provided for Green Volt Offshore Windfarm Ltd (**Green Volt**).

Caledonia Offshore Wind Farm is a 2GW project located in the outer Moray Firth, with onshore grid connection confirmed for New Deer. The site was awarded to Ocean Winds under the Scottish Government's ScotWind process and will be the company's third offshore wind farm in the Moray Firth.

Caledonia Offshore Wind Farm wishes to provide the following comments on the additional information submitted by Green Volt OWF. We have concerns with the way in which aspects of the Green Volt project have been designed without regards to other known projects. This issue can only be fully understood by setting out the evolution of the project.

Scoping Report

Green Volt submitted a Scoping Request and Report for offshore on 2 December 2021. The Report, dated 15 November 2021, considered potential cumulative impacts at section 5.7 on page 66. It stated that the cumulative assessment would consider "*other offshore wind farms and associated cabling and infrastructure*" and also specified other types of development.

Scoping Opinion

The Scottish Government provided its response to the scoping request in April 2022. Within the response at paragraph 2.3.1, the Scottish Ministers made the following statement under the heading Offshore/Planning:

Caledonia Offshore Wind Farm Limited
5th Floor Atria One, 144 Morrison St.
EDINBURGH EH3 8EX



“The Scottish Ministers note that the Scoping Report only describes the offshore works. It is essential that the EIA Report concerning onshore works will be available at the time that the EIA Report for the Proposed Development is being considered so that all information relating to the project “as a whole” is presented. The EIA Report for the proposed development must consider the cumulative impacts with the onshore works.”.

Under paragraph 5.8.1, the Scottish Ministers stated the following,

“In section 5.7 of the Scoping Report the Developer states that there is potential for predicted impacts on physical processes (receptors discussed above in 5.2 to 5.7) to interact with impacts from other projects and activities in the physical process study area and lead to a cumulative effect on the receptors. The Scottish Ministers agree with the projects and activities identified to be included in the cumulative assessment for the physical process study area and highlight the representation received from Shell. The Scottish Ministers advise that a cumulative assessment must be included in the EIA Report.”.

Applications

A Section 36 application was submitted on 20 January 2023. It was accompanied by an Environmental Impact Assessment Report. Technical Appendix 20.1 provides a long list of projects to potentially be screened in relation to cumulative impact assessment. This incorporates a reference to the Caledonia Offshore Wind Farm and identifies that the current status was stated– In planning: project secured a lease and Scoping Report had been submitted. Against that background, there was an acknowledgement of data confidence being medium and a clear identification for the potential for temporal overlap with all phases of the Caledonia Offshore Wind Farm lifespan given the similar time span for development. It also identified similar construction periods.

Notwithstanding the above information, Green Volt have given no consideration to the Caledonia Offshore Wind Farm when considering the onshore elements of their project. Despite Green Volt having full knowledge that there was potential interaction with the onshore elements of the Caledonia Offshore Wind Farm, they have not evaluated it in any way. In that context, they have written to Aberdeenshire Council confirming that they do not propose to provide any additional information when it comes to representations made in respect of the onshore application. We enclose a copy of the email from the Green Volt Project to Aberdeenshire Council dated 18 October 2023. As you can see, Flotation Energy on behalf of Green Volt propose to have a separate approach to cumulative impact depending on whether the project is on or offshore. This fails to deliver the clear requirement in the Scoping Opinion issued by the Scottish Government that on and offshore matters had to be considered as a project. It would be unsound for the project to be considered on a different cumulative basis. Consequently, Green Volt have failed to consider other projects in the formulation of their onshore elements, potentially undermining a key purpose of the onshore substation; the provision of a geographic location where the output from multiple projects is brought together. Specifically, they have failed to consider the

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effect that their substation site selection would have on the ability of other offshore projects to connect to the existing New Deer substation, meaning that the connection capacity available there is unable to be used as it is needed. This has the real prospect of frustrating the delivery of ScotWind capacity in an area that can deliver quickly. This cannot have been the intention of the INTOG leasing round.

If Green Volt had taken other projects into account at the right stage of the process their onshore proposal is likely to have been different. Green Volt have chosen to bring forward their applications prior to having an Option to Lease Agreement with Crown Estate Scotland, prior to the publication of the Scottish Government's further Sectoral Marine Plan providing for the delivery of the offshore leasing rounds and before the national grid entities have finalised the connection strategies and finalised grid offers in this part of Scotland. Against the above background, it is likely that the granting of any project consent to Green Volt is premature and therefore not in the best public interest at this time. This would have to be taken into account in assessing whether the project could meet the tests set out in the without prejudice derogation case.

The Green Volt project has failed to follow the requirements set out in the Scoping Opinion and is in breach of the requirements of it. It is also of concern as to whether the assessments undertaken by Green Volt have properly considered the potential interaction between the marine and onshore environments. This would extend into all of the assessments including the HRA. In the circumstances, there is a gap in the completeness and quality of the EIAR material relating to this project. It has pursued an inconsistent approach to cumulative assessment. Further Environmental information is required to assess the project comprehensively.

“Without Prejudice” derogation case

In terms of the onshore material that Green Volt have submitted to Aberdeenshire Council, they make specific reference in the Non-Technical Summary to their grid connection which they claim was made in June 2021 and accepted. At no stage in the material do Green Volt acknowledge that this is restricted to 300MW and that currently on the TEC register, any connection is predicted to occur in 2029.

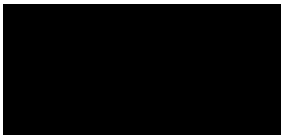
The above material all becomes relevant because of the material submitted by Green Volt in their “without prejudice” derogation case. The derogation case is based on a consideration of the whole project because the benefits only accrue should the onshore grid connection also be constructed. In terms of the definition of the project, it is confirmed under paragraph 14 that the project is going to have an indicative generating capacity of between 490-560MW. At no stage have Green Volt advised the planning authority of this ambition or that the proposals which they have submitted are for a scale of infrastructure relating to a capacity above that for which they have a grid connection for. In paragraph 63 of the project need case, there is the claim that the project can be delivered to come into operation by 2027. The current evidence on the grid connection does not support that claim in terms of the capacity and timing of delivery.

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5th Floor Atria One, 144 Morrison St.
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The Scottish Government has yet to publish the final updated Sectoral Marine Plan for offshore wind. This will provide important policy context for determining whether the public interest test can be met. This policy document will set out the framework on how the ScotWind and INTOG leasing rounds can be delivered. The recent National Policy Statements on Energy published by the UK Government in November 2023 have emphasised the need for projects to co-operate, particularly in the field of grid connection. Scotland has embarked on a far more ambitious programme for offshore wind and this will inevitably involve an even greater need for co-operation.

The above evidence significantly undermines the claims that have been made in the derogation case which is currently being consulted upon. The reasons in part stem from the failure to properly evaluate other projects in the project formulation of the onshore infrastructure. Furthermore, the Scottish Ministers and Aberdeenshire Council should seek supplementary information to ensure that full land use effects of the project as a whole are properly assessed.

Yours Sincerely,



Mark Baxter, Caledonia OWF Project Director.

Caledonia Offshore Wind Farm Limited
5th Floor Atria One, 144 Morrison St.
EDINBURGH EH3 8EX

Kate Taylor

From: Tracey Clarkson-Donnelly <traceyclarkson@flotationenergy.com>
Sent: 18 October 2023 19:01
To: Stuart Newlands
Cc: Catarina Rei; Ruaridh Danaher; Mark Baxter; Mark McDonald; Tom Harrison
Subject: Green Volt_Planning Application APP/2023/1454_Ocean Winds' Comments, Mark Baxter

Follow Up Flag: Follow up
Flag Status: Completed

Caution!! External email. Do not open attachments or click links, unless this email comes from a known sender and you are sure the content is safe.

Hello Stuart,

With regards to the representation from Caledonia Offshore Wind Farm Ltd (Ocean Winds) we welcome their support in relation to the delivery of critical energy infrastructure in order to deliver Scottish and UK Net Zero targets.

We note concerns raised regarding the potential for a spatial overlap or cumulative effects in relation to a proposed future cable from Caledonia Offshore Wind Farm Ltd, that we believe also intends to connect to the National Grid New Deer Substation (NGDSS). Potential cumulative effects with other developments have been a key consideration in designing the Proposed Development and is addressed in each relevant chapter of the Planning Application submission and the Environmental Impact Assessment. In order to provide a proportionate assessment of the potential for cumulative impacts, a range of projects have been selected based on the National Planning Framework 4 definition of Cumulative Impacts:

'Impact in combination with other development. That includes existing developments as appropriate, those which have permission, and valid applications which have not been determined. The weight attached to undetermined applications should reflect their position in the application process.'

In this instance, it is not considered that the future cable mentioned in the representation is at a phase that would require cumulative consideration under that definition because it is in the Scoping phase and is not a valid planning application.

However, Flotation Energy as applicant are keen to engage with Caledonia Offshore Wind Farm Ltd and have reached out to begin the conversation.

Flotation Energy look forward to effective collaboration with Ocean Winds in the future.

Tracey

Tracey Clarkson-Donnelly
Consent Lead (Onshore)

Flotation Energy Ltd
12 Alva Street
Edinburgh
EH2 4QG

Dept Tel: +44 (0) 1224 548 640

Mobile: [REDACTED]
Email: traceyclarkson@flotationenergy.com



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Chamber of Shipping

From: [Robert Merrylees](#)
To: [MD Marine Renewables](#)
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023
Date: 20 December 2023 15:21:40
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)

Good afternoon Kate,

Thank you for the email, confirm a nil return on behalf of the Chamber of Shipping.

Kind regards

Robert

Dee District Salmon Fishery Board

From: [Jamie Urquhart](#)
To: [MD Marine Renewables](#); [Edwin Third](#)
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023
Date: 20 December 2023 14:44:00
Attachments: [image001.png](#)
[image002.png](#)

Dear Kate

Yes that is the case on this occasion the Dee DSFB will not be submitting a response to this consultation due to the focus on Ornithology within the Additional Information. Therefore there was no material change to areas of our concern.

Best regards Jamie

Jamie Urquhart
Fisheries Protection Manager
Dee District Salmon Fishery Board & River Dee Trust

River Office
Mill of Dinnet
Dinnet
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Historic Environment Scotland



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to:

MD.MarineRenewables@gov.scot

Marine Scotland (Marine Renewables)
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300055446

09 November 2023

Dear Marine Scotland

[The Marine Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017
Green Volt Offshore Wind Farm - Additional Information Application Consultation](#)

Thank you for your consultation which we received on 03 November 2023. We have considered it and its accompanying EIA Report in our role as a consultee under the terms of the above regulations and for our historic environment remit as set out under the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. Our remit is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories.

You should also seek advice from your archaeology and conservation service for matters including unscheduled archaeology and category B and C-listed buildings.

Our Advice

We understand that the consultation comprises a supplementary ornithological assessment and Ornithology Compensation Measures Report.

We have considered the information received and do not have any comments to make on the proposals. Our decision not to provide comments should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.

Further Information

This response applies to the application currently proposed. An amended scheme may require another consultation with us.

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-



HISTORIC
ENVIRONMENT
SCOTLAND

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EACHDRAIDHEIL
ALBA

[historic-environment-guidance-notes/](#). Technical advice is available through our Technical Conservation website at www.englished.org.

Please contact us if you have any questions about this response. The officer managing this case is Sam Fox who can be contacted by phone on 0131 668 6890 or by email on samuel.fox@hes.scot.

Yours faithfully

Historic Environment Scotland

Joint Nature Conservation Committee

From: [JNCC Offshore Industries Advice](#)
To: [MD Marine Renewables](#)
Cc: [JNCC Offshore Industries Advice](#)
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023
Date: 20 November 2023 13:37:39
Attachments: [image002.png](#)
[image004.png](#)
[image005.png](#)
[image003.png](#)

Good Afternoon Kate

Thank you for consulting JNCC on the Green Volt Offshore Wind Farm, which we received on 03/11/2023.

JNCC's role in relation to offshore renewables in Scottish waters has been delegated to NatureScot.

NatureScot is now authorised to exercise the JNCC's functions as a statutory consultee in respect of certain applications for offshore renewable energy installations in inshore and offshore waters (0-200nm) adjacent to Scotland.

Therefore, NatureScot should provide a full response. If required NatureScot will contact JNCC directly where input is required.

We have As such JNCC have not reviewed this application and will not be providing further comment.

Kind regards,

Jon Cannon

Offshore Industries Advice Officer

Marine Management Team

JNCC, Inverdee House, Baxter Street, Aberdeen, AB11 9QA

Tel: 01224 083522

Working pattern: Monday to Friday

[Website](#) [Twitter](#) [Facebook](#) [LinkedIn](#)



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We are inclusive, collaborative, innovative

-

Joint Radio Company

From: [JRC Windfarm Coordinations Old](#)
To: [MD Marine Renewables](#)
Cc: [Wind SSE](#)
Subject: Green Volt Offshore Wind farm [WF511681]
Date: 21 November 2023 10:36:36
Attachments: [image.png](#)

Dear scottish,

A Windfarms Team member has replied to your co-ordination request, reference **WF511681** with the following response:

If any details of this proposal change, particularly the disposition or scale of any turbine(s), this clearance will be void and re-evaluation of the proposal will be necessary.

Please do not reply to this email - the responses are not monitored.

If you need us to investigate further, then please use the link at the end of this response or login to your account for access to your co-ordination requests and responses.

Dear Kate

Planning Ref: 00010231 / 00010232 / 00010230

Name/Location: Green Volt Offshore Wind Farm

Turbine(s) at NGR: (none given)

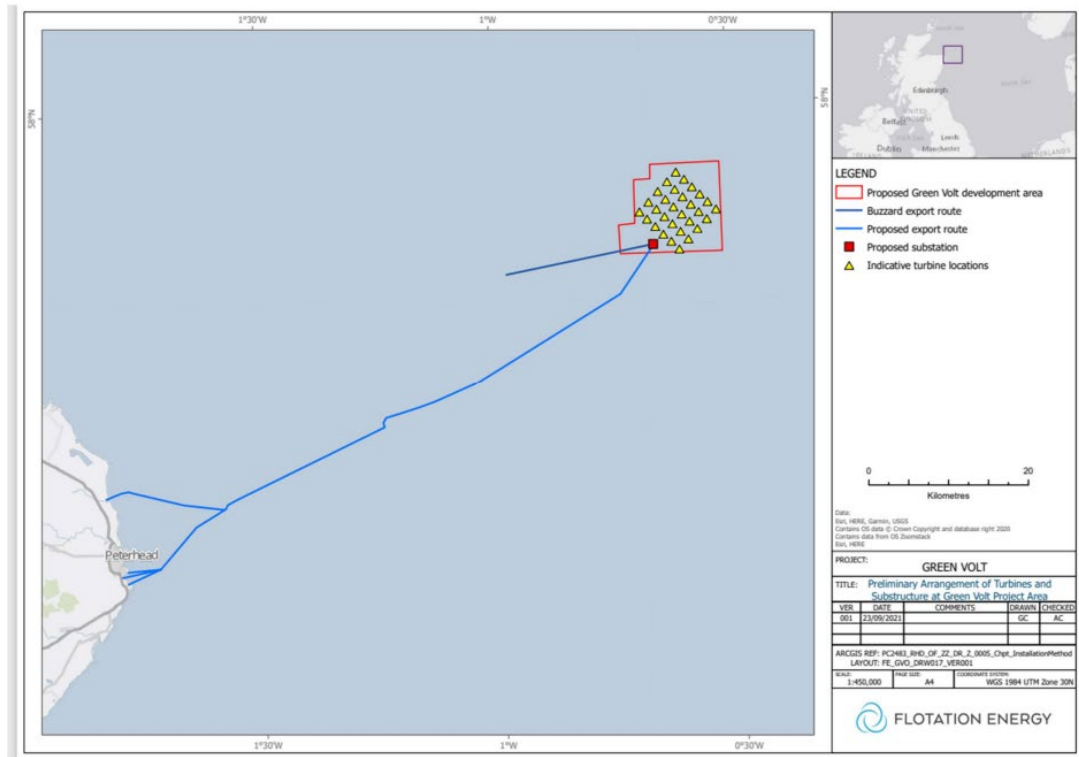


Figure 2.2 Preliminary arrangement of turbines and substructure at Green Volt Project Area.

Development Area: 144km²

Tip Height: MSL*+270m **Hub Height:** LAT^+133m **Rotor Radius:** 111m *mean sea level ^lowest astronomical tide

We requested turbine / development area NGR coordinates on 7/11/23 and as yet have had no response.

Without coordinates we cannot make a detailed analysis, however based on the image provided to us (above), this proposal is **cleared** with respect to radio link infrastructure operated by the local energy networks.

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.

Regards

Wind Farm Team

Friars House
Manor House Drive
Coventry CV1 2TE
United Kingdom

Office: 02476 932 185

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.

Registered in England & Wales: 2990041

[About The JRC \ Joint Radio Company \ JRC](#)

We maintain your personal contact details and are compliant with the Data Protection Act 2018 (DPA 2018) for the purpose of 'Legitimate Interest' for communication with you. If you would like to be removed, please contact anita.lad@jrc.co.uk.

We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email by clicking on the link below or login to your account** for access to your co-ordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?id=31773>

Maritime & Coastguard Agency

From: [navigation safety](#)
To: [MD Marine Renewables](#)
Cc: [Sam Chudley](#); [Vinu John](#); [Nick Salter](#); [Helen Croxson](#)
Subject: FW: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023
Date: 16 January 2024 14:53:54
Attachments: [image003.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image002.png](#)

Good Afternoon Kate,

Please see below response sent to you on the 20th December 2023.

Kind regards,

Vaughan

Vaughan Jackson

Offshore Renewables Project Lead
UK Technical Services Navigation



Maritime &
Coastguard
Agency

vaughan.jackson@mcga.gov.uk

Maritime & Coastguard Agency

Bay 2/25, Spring Place
105 Commercial Road,
Southampton SO15 1EG



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www.gov.uk/mca

From: navigation safety
Sent: Wednesday, December 20, 2023 1:43 PM
To: 'MD.MarineRenewables@gov.scot' <MD.MarineRenewables@gov.scot>; navigation safety <navigationsafety@mcga.gov.uk>; Helen Croxson <Helen.Croxson@mcga.gov.uk>; Nick Salter <Nick.Salter@mcga.gov.uk>
Cc: Vinu John <Vinu.John@mcga.gov.uk>; Vaughan Jackson <Vaughan.Jackson@mcga.gov.uk>
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023

Good afternoon Kate,

Thank you for your correspondence regarding the additional information submitted by Green Volt Offshore Windfarm as requested by the Scottish Ministers. As the request concerned additional Ornithological and habitats information, we do not have any comments to make on the submission.

Kind regards,

Vaughan.

Vaughan Jackson

Offshore Renewables Project Lead
UK Technical Services Navigation



Maritime &
Coastguard
Agency




vaughan.jackson@mca.gov.uk

Maritime & Coastguard Agency
Bay 2/25, Spring Place
105 Commercial Road,
Southampton SO15 1EG

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www.gov.uk/mca

Ministry Of Defence

From: Teena.Oulaghan100@mod.gov.uk
To: [MD Marine Renewables](#)
Subject: 20231206_MOD_Response_Green Volt Offshore Wind Farm - Additional Information Application Consultation
Date: 06 December 2023 12:48:09
Attachments: [image001.png](#)
[image002.png](#)
[20231206_Copy_MOD_Objection_Letter.pdf](#)

Good Afternoon,

Thank you for consulting the Ministry of defence (MOD) on the additional information for Green Volt Offshore Wind Farm received by our office on 03/11/2023.

I can confirm that I have reviewed the submitted documents and additional information, and as neither the turbine locations or dimensions have been amended, the MOD's position as of 03/03/2023 remains extant (copy of response attached for ease).

Although the MODs current position is to object to this development due to the detrimental impact on the Air Defence Radar at RAF Buchan, I can confirm that the MOD has received a mitigation proposal from the developer to address the impact. If, and when, any agreement is reached, the MOD will write again to Scottish Government to update our position.

Kindest Regards

Teena

Teena Oulaghan | Safeguarding Manager

Defence Infrastructure Organisation

Estates | Safeguarding

DIO Head Office | St George's House | DMS Whittington | Lichfield | Staffordshire | WS14 9PY

Mobile: [REDACTED]

Email: teena.oulaghan100@mod.gov.uk

Natural England

Date: 14 December 2023
Our ref: 445794



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BY EMAIL ONLY

Dear Kate,

Green Volt Offshore Wind Ltd – Additional Information – Green Volt Offshore Windfarm, East of Aberdeenshire Coast

Thank you for your consultation which we received on the 3rd November 2023 consulting Natural England on the Green Volt Floating windfarm.

The following constitutes Natural England's formal statutory response. This is without prejudice to any comments we may wish to make considering further submissions or on the presentation of additional information.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). We have delegated responsibility from JNCC to also advise on offshore wind farms in all English waters out to 200 nautical miles or the median line.

As the application is located outside English waters, advice from NatureScot and JNCC, the statutory nature conservation bodies for Scottish waters, should be sought.

Due to our remit, we have restricted our comments to impacts to species from English Marine Protected Areas and to species in English waters: marine mammals, fish and birds.

Having examined the documents provided, we have no further comment.

For any queries relating to the content of this letter please contact me using the details provided below. Any further consultations on this or other projects, should be forwarded to consultations@naturalengland.org.uk

Yours sincerely

Ruth Cantrell

Marine Senior Adviser
Northumbria Area Team
Natural England
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NatureScot



NatureScot
NàdarAlba

Scotland's Nature Agency
Buidheann Nàdair na h-Alba

Kate Taylor
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29 January 2024

Our ref: CNS REN OSWF Green Volt
- INTOG

Dear Kate,

GREEN VOLT OFFSHORE WIND FARM – ADDITIONAL INFORMATION

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCE UNDER PART 4 OF THE MARINE (SCOTLAND) ACT 2010 AND MARINE AND COASTAL ACCESS ACT 2009

Thank you for consulting NatureScot on the additional information for the proposed Green Volt Offshore Wind Farm. The proposal, comprising a project design envelope approach, includes up to 35 wind turbines (tip height 264 m) with an installed capacity of 560 MW and proposed 35 year operational lifetime.

This response considers the documents associated with the additional information, namely the Supplementary Ornithological Assessment, the Without Prejudice Derogation Case and the Offshore Ornithology Compensation Measures Report.

Background

In our advice sent to Marine Scotland (now Marine Directorate) on 19th April 2023, we requested additional information to assist our assessment of ornithological impacts. This letter provides advice on this additional information, submitted in November 2023, namely the Supplementary Ornithological Assessment.

Also within our previous advice, dated 19th April 2023, we advised that for the Green Volt application it is likely that, in combination with other wind farms - operational, consented and proposed, any SPAs / species where we concluded an adverse effect on site integrity (AEoSI) for Berwick Bank (either alone or in combination) and where there is likely to be an additional impact from Green Volt, we will also be considering a conclusion of AEoSI in combination for Green Volt. Due to this advice, the applicant has decided to present a Without Prejudice HRA Derogation Case and an Offshore Ornithology Compensation Measures Report to enable the competent authority

to undertake a Habitats Regulations Assessment. This letter also provides advice on this Without Prejudice Derogation package.

NatureScot advice

Our advice in response to the Additional Information for ornithology submitted by Green Volt can be summarised as follows:

- We are content that the Supplementary Ornithological Assessment adequately addresses our concerns about the Green Volt Application raised in our response of 19th April 2023.
- We agree that for the project alone impacts, this proposed project will not result in an Adverse Effect on Site Integrity (AEoSI) for any SPAs and features assessed.
- For the features and sites listed below, we conclude AEoSI in-combination with other projects. We therefore disagree with the applicant's conclusion of no AEoSI.
 - Kittiwake at Buchan Ness to Collieston Coast SPA (both with and without Berwick Bank OWF).
 - Kittiwake and razorbill at East Caithness Cliffs SPA (both with and without Berwick Bank OWF).
 - Guillemot at East Caithness Cliffs SPA (without Berwick Bank OWF).
 - Gannet at Forth Islands SPA (both with and without Berwick Bank OWF).
 - Kittiwake at Fowlsheugh SPA (both with and without Berwick Bank OWF).
 - Guillemot at Fowlsheugh SPA (with Berwick Bank OWF and potential AEoSI without).¹
 - Kittiwake at Troup, Pennan and Lion's Head SPA (both with and without Berwick Bank OWF).
- For the features and sites listed below, we are unable to conclude no AEoSI in-combination with other projects. However, we consider that the project contribution to the in-combination impacts is small and as such does not make a tangible contribution to the impacts.
 - Kittiwake and puffin at Forth Islands SPA (both with and without Berwick Bank OWF).
 - Razorbill at Fowlsheugh SPA (both with and without Berwick Bank OWF).
 - Kittiwake at North Caithness Cliffs SPA (both with and without Berwick Bank OWF).
 - Kittiwake at St Abbs Head to Fast Castle SPA (both with and without Berwick Bank OWF).
 - Kittiwake at West Westray SPA (both with and without Berwick Bank OWF).
- We acknowledge that the applicant has provided the following documents, despite their conclusion of no adverse effect on site integrity:
 - Without Prejudice HRA Derogation case, and
 - Offshore Ornithology Compensation Measures Report

¹ Noting that for guillemot at Fowlsheugh SPA we consider there is AEoSI in-combination with Berwick Bank and advise there is potential for AEoSI in-combination with other projects, without Berwick Bank.

We provide our advice only on the compensation measures report in Appendix B below. We note, in summary, that at present the measures proposed are high level and relate more specifically to the potential to contribute funds to more strategic / plan level compensation. If Scottish Ministers are minded to consent this application, further discussion may be required to agree compensation measures if there is a conclusion of adverse effect on site integrity within the appropriate assessment.

We provide further advice on these aspects with regards to each of the additional information documents, as follows:

- Advice on the Supplementary Ornithological Assessment is provided in Annex A.
- Advice on the Offshore Ornithology Compensation Measures Report is provided in Annex B.

Further information and advice

We hope this advice is helpful. Please contact me, Jenna Lane, in the first instance for any further advice.

Yours sincerely

Jenna Lane

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NatureScot ADVICE FOR GREEN VOLT OFFSHORE WIND FARM – ADDITIONAL INFORMATION

APPENDIX A – SUPPLEMENTARY ORNITHOLOGICAL ASSESSMENT

The Supplementary Ornithological Assessment is provided as a Technical Appendix to the EIA Report (Technical Appendix 12.8).

Adequacy of additional ornithological information

We are content that the Supplementary Ornithological Assessment adequately addresses our concerns about the Green Volt Application raised in our response of 19th April 2023. This additional information is sufficient to enable us to assess the impacts of the project on marine ornithology.

Only one point is not fully resolved. We had concerns over Standard Deviation calculations for density estimates used in the collision risk modelling. The applicant has used a very simplistic way of calculating Standard Deviation (SD), known as the Range rule for SD, which is explained in the supplementary information. While this is not what we would expect and we have less confidence in the variation using this method, we are prepared to accept its use in this case.

Full details of the additional ornithological information we requested, and our subsequent comments can be found in Table 1 below.

Table 1: Summary of NatureScot ornithological advice where further information was required and comments on the information provided in ‘The Supplementary Ornithological Assessment Report’

NatureScot advice where further information was required	Additional information provided - NatureScot comments
Population Viability Analysis (PVA)	
Not all predicted impacts for species and designated sites have been run through PVA, and we have been uncertain at times in the assessment of being able to follow the sequence and/or some of the values used, as they differ across different parts of the assessment. We are concerned about the transparency of the approach and therefore the overall findings.	Predicted impacts for all assessed sites and features are presented clearly in tables in Section 5, both for the applicant’s approach and our advised approach, project alone and in-combination. Where impacts require PVA to be undertaken these are presented in Section 6.
An approach with generic scenarios has been used in the approach to PVA, rather than using specific values.	Specific values have been used in undertaking PVA for all sites /features where PVA is required (Section 6).
The applicant has only undertaken a few SPA level PVAs and for generic level of impact, not the estimated project alone or in combination impacts. Therefore, they do not provide any project specific counterfactuals, to enable us to assess and provide any advice.	PVAs have been undertaken with specific values for project alone and in-combination impacts where 0.02 percentage point change in mortality threshold is met or exceeded.

<p>The applicant has used a 1% threshold on mortality to consider impacts. Our advice is to use 0.02 percentage point change in mortality as a threshold for undertaking PVAs, which can generate counterfactuals for population growth rate and population size, which we would use to draw conclusions on population level impacts.</p>	<p>0.02 percentage point change in mortality is used for undertaking PVA, as advised in the NatureScot advice.</p> <p>This metric is provided alongside an increase of 1% or more in the baseline mortality rate metric, referred to as the applicant's approach.</p> <p>They describe their method for calculating 0.02 in Section 5. Although a rather convoluted explanation - it is correct. Tables 28-33 give project alone impact values and % point change in survival, showing those 0.02 or more.</p> <p>All features with 0.02 percentage point change in mortality or more are taken forward for PVA.</p>
<p>The applicant has not relied on the outputs of the Counterfactual for Population Size (CPS). Although these are presented, they are not used in their final assessment, instead relying solely on the Counterfactual Growth Rate (CGR). This is contrary to our guidance.</p>	<p>CPS and CGR metrics are both presented in Section 6 and used in the assessments.</p>
<p>The PVA models have been run for 35 years. We advise that the results of the PVA should be run for both 25 years and 35 years to aid comparability with other offshore wind projects as well as to reflect the proposed operational period.</p>	<p>The applicant has presented Tables comparing PVA outputs from both 25 and 35 year runs in Section 6 of the Report.</p>
In combination	
<p>The applicant has stated that the in-combination assessment was completed prior to the submission of the Berwick Bank application, therefore Berwick Bank has not been included in the assessment, yet Berwick Bank has been in the public domain and the scoping opinion issued prior to the Green Volt application being submitted. We have recently objected to the Berwick Bank application due to adverse effects on site integrity (AEoSI) to multiple seabird species within the UK European Site Network, some</p>	<p>The applicant has presented impacts to sites and features with and without Berwick Bank OWF in the assessment of in-combination effects for the Project in Sections 5 and 6.</p>

<p>of which overlap with the species and sites assessed in this application. We therefore advise that for this application, it is likely that, in combination with Berwick Bank, any of the SPAs / species where we have concluded AEOsI for Berwick Bank (either alone or in combination) and where there is likely to be any additional impact from Green Volt, we will also be considering a conclusion of AEOsI in combination for Green Volt.</p>	
<p>Collision Risk Modelling (CRM)</p>	
<p>While many of the input parameters used for the collision risk modelling are those identified within our guidance, we advise the following deviations: - Gannet flight speed – the applicant uses 13.33 and we advise 14.9</p>	<p>They have presented both the applicant’s and SNCB approaches for all species assessed for collision and have used both approaches in PVAs.</p> <p>The applicant’s approach uses flight speeds from Skov <i>et al.</i>, for all 4 species assessed for collision risk, not just gannet. Nocturnal Activity Factors (NAF) also differ from those recommended in our guidance.</p>
<p>We have some concerns over Standard Deviation calculations for density estimates used in collision risk modelling. This is not a commonly used method - our understanding is that it uses 25% of the 95% confidence limits. Typically, the 95% confidence limits are 1.96 SD from mean for a normal distribution. However, we noted that range around the mean appeared to be skewed, suggesting it was not equally distributed and therefore we are not sure if this approach was used for reasons related to this. We request clarification from the applicant on this point, including citation and rationale</p>	<p>They have used a very simplistic way of calculating Standard Deviation (SD) where $SD = (\max - \min) \text{ divided by } 4$. (Known as the Range rule for SD).</p> <p>While this is not what we would expect and have less confidence in the variation using this method, we are prepared to accept its use.</p>
<p>Displacement</p>	
<p>The conclusions reached were based on the applicant’s displacement and mortality rates, not the rates advised by NatureScot</p>	<p>The applicant has presented the applicant’s approach and our recommended approach, which uses the rates advised by us. The SNCB figures for displacement and mortality rates are correct.</p>
<p>Combined displacement /collision risk</p>	

<p>The applicant has raised concerns over the precaution in combining collision impacts with distributional response impacts. Due to the evidence publicly available we maintain this is currently the best approach for considering species, such as gannet and kittiwake which are susceptible to both impacts. We are aware of work being undertaken by Natural England on this, and once this is publicly available, we will be reviewing our guidance on this aspect.</p>	<p>Assessments for combined impacts from collision and displacement for gannet and kittiwake are presented using NatureScot's approach.</p>
Apportioning	
<p>The apportioning within Annex 2 of the RIAA appears to show a mix of colonies used within the tables (Table 2 vs Appendix 1). Instead, we require to see the apportioning for each SPA and any non-SPA colonies clearly identified. Our understanding of Table 2 is that it indicates the totals for the whole SPAs, with the appendix table suggesting that Seabird Monitoring Programme (SMP) sub-colonies were used and apportioned and then totalled for whole SPAs. Could the applicant confirm if this understanding is correct? We also ask the applicant to confirm the year of the data used for the totals to ensure this is consistent across colonies</p>	<p>Breeding season colony counts are presented in Tables 13-17. Sub colonies related to specific SPAs are shown, and sub colony figures are added together to give SPA totals. Dates of counts are provided. Non-SPA colony counts are also shown.</p> <p>Tables 18-22 show the results of using the SNH apportioning tool for SPAs and non-SPA colonies.</p> <p>These tables would have been easier to interpret if all the SPAs had been listed first, followed by non-SPA sites, rather than mixed together, though we appreciate that there was some logic to arranging the table by geographic location.</p>

Assessment of predicted impacts on Special Protection Areas (SPAs) and associated features

As there is sufficient additional information provided in the Supplementary Ornithological Assessment Report, we are able to carry out an assessment of the potential impacts of the project on marine ornithology and, specifically, on Special Protection Areas (SPAs) and their protected features.

Predicted impacts for all assessed sites and features are presented clearly in tables in Section 5 of the report, both for the applicant's approach and our recommended approach referred to as Statutory Nature Conservation Body (SNCB) approach, project alone and in-combination. Where impacts require Population Viability Analysis (PVA) to be undertaken these are presented in Section 6.

Project alone impacts

For the project alone, Section 6.4 of the Supplementary Ornithological Assessment report concludes that the PVA results show there will be no Adverse Effect on Site Integrity (AEoSI) for any SPAs and features assessed.

PVA was carried out for guillemot at four sites (Buchan Ness to Collieston Coast, Troup, Pennan and Lion's Head, East Caithness Cliffs, North Caithness Cliffs SPAs) and razorbill at one site (Troup, Pennan and Lion's Head SPA). We agree with the applicant's conclusions that there will be no AEoSI for any SPAs and features assessed for the project alone assessment.

In-combination impacts

As we requested, the applicant has presented impacts to sites/features with and without Berwick Bank Offshore Wind Farm (OWF) in the assessment of in-combination effects for the Project in Sections 5 and 6 of the report.

Applicant's conclusions from PVA (Section 6.4)

The applicant has concluded no AEoSI for all sites and features in-combination, with or without Berwick Bank. They provide various reasons in justification of their conclusions as follows:

Kittiwake

- Their conclusion of no AEoSI was determined for all sites with kittiwake as a feature on the basis that their approach is considered the most realistic scenario.
- All scenarios are considered over precautionary given the impacts for displacement and collision are combined for the assessment.
- Although the results from the PVA using the applicant's approach demonstrate a reduction in population size after 35 years, the additional annual mortality contributed by the Project is considerably less than one bird and therefore there is no tangible contribution from the Project to the in-combination impact.

Gannet

- Their conclusion of no AEoSI was determined for all sites with gannet as a feature on the basis that all scenarios are considered over precautionary, as advice provided by NatureScot has not incorporated the latest scientific evidence.
- The impacts for displacement and collision are combined for the assessment.
- Gannet flight speed for collision modelling is not sourced from the most robust scientific evidence.

Guillemot & razorbill

- No AEoSI was determined by the applicant's based on their approach.

Puffin

- The applicant concluded the additional annual mortality contributed by the Project is considerably less than one bird and therefore there is no tangible contribution from the Project to the in-combination impact.

General comments on the applicant's justifications for their conclusions

Applicant's approach

Their assessment based on our advised approach is presented in the supplementary information. This follows our current guidance on carrying out an impact assessment for ornithology for an offshore wind farm, as laid out in our Guidance Notes 1-11².

However, the applicant's approach assessment does provide a useful comparison, and we note that in a number of instances both approaches result in PVA results that are of concern.

Combining displacement and collision risk for kittiwake and gannet

Our current advice is that collision and displacement should be combined for these species. We are aware of ongoing work to explore this and our guidance will be updated once research has been reviewed and published.

For kittiwake a precautionary approach is recommended due to evidence that supports mixed responses from kittiwake to offshore wind farm developments (i.e. some birds are displaced and others are not and so are therefore at risk of collision).

We acknowledge the work undertaken by Natural England to look at how gannet behave with respect to macro avoidance. However, we currently do not consider there is enough evidence from the breeding season, or from studies close to SPA colonies in Scotland, for us to accept this, particularly in the breeding season.

Flight Speeds

Work is currently being undertaken using tracking data for a number of species at a range of sites, which will provide further information on flight speeds. Until such evidence can be reviewed and approved by the Statutory Nature Conservation Bodies (SNCBs), we continue to recommend the use of flight speeds presented in Pennycuik (1997) and Alerstam *et al.* (2007).

There is no tangible contribution from the Project to the in-combination impact

We agree with the applicant's view that there is no tangible contribution from the Project to the in-combination impact in some instances.

However, there are sites/features where we are unable to conclude no AEoSI, but we consider that the project contribution to the in-combination impacts, does not make a tangible contribution to the impacts.

² <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/renewable-energy/marine-renewables/advice-marine-renewables-development>

NatureScot assessment of PVA results and determination of AEoSI

Summary

There are some SPAs and qualifying features for which we disagree with the applicant's conclusion of no AEoSI.

For the features and sites listed below we conclude AEoSI in-combination with other projects (tables below provide more detail):

- Kittiwake at Buchan Ness to Collieston Coast SPA (both with and without Berwick Bank OWF).
- Kittiwake and razorbill at East Caithness Cliffs SPA (both with and without Berwick Bank OWF).
- Guillemot at East Caithness Cliffs SPA (without Berwick Bank OWF).
- Gannet at Forth Islands SPA (both with and without Berwick Bank OWF).
- Kittiwake at Fowlsheugh SPA (both with and without Berwick Bank OWF).
- Guillemot at Fowlsheugh SPA (with Berwick Bank OWF and potential AEoSI without).³
- Kittiwake at Troup, Pennan and Lion's Head SPA (both with and without Berwick Bank OWF).

For the features and sites listed below we are unable to conclude no AEoSI in-combination with other projects. However, we consider that the project contribution to the in-combination impacts is small and as such does not make a tangible contribution to the impacts.

- Kittiwake and puffin at Forth Islands SPA (both with and without Berwick Bank OWF).
- Razorbill at Fowlsheugh SPA (both with and without Berwick Bank OWF).
- Kittiwake at North Caithness Cliffs SPA (both with and without Berwick Bank OWF).
- Kittiwake at St Abbs Head to Fast Castle SPA (both with and without Berwick Bank OWF).
- Kittiwake at West Westray SPA (both with and without Berwick Bank OWF).

Species assessments

The following assessments are based on the CPS outputs from the PVAs for the features where PVA was required. We focused on the results using our approach, but also took into account the results using the applicant's approach. The assessments also considered the feature condition/population status and the project contribution to the in-combination impacts.

Kittiwake

CPS in-combination values for Kittiwake after 35 years, using our approach, are low and of concern at 9 SPAs, both with and without Berwick Bank OWF. The SPAs are listed in Table 1 below. We note that, for all these sites, the CPS values using the applicant's approach are higher than those using our approach, but they are nonetheless low enough to be of concern.

Values are notably much lower and impacts higher where Berwick Bank is included for the Forth Islands and St Abb's Head to Fast Castle SPAs.

³ Noting that for guillemot at Fowlsheugh SPA we consider there is AEoSI in-combination with Berwick Bank and advise there is potential for AEoSI in-combination with other projects, without Berwick Bank.

In general, kittiwake populations are in decline, with the recent Seabird Count indicating an overall population decline in Scotland of 57% since Seabird 2000, which makes any additional pressures on these populations an issue. The kittiwake populations at all the 9 SPAs being considered are declining.

From the CPS results and considering the declining populations, we are unable to conclude no AEoSI for the kittiwake feature at all the 9 SPAs in Table 1.

However, it is noted that the project contribution is well under 1% of the total mortality for most sites with only Buchan Ness to Collieston Coast and Troup, Pennan and Lion's Head SPAs slightly higher at 1-1.4%.

Table 1: Assessment of in-combination impacts on kittiwake

SPA	Predicted mortality in-combination with Berwick Bank (birds per annum)	Predicted mortality in-combination without Berwick Bank (birds per annum)	Predicted mortality from Green Volt (birds per annum)	Percentage contribution to in-combination effects*	CPS (with Berwick Bank)	CPS (without Berwick Bank)	Determination of AEoSI
Buchan Ness to Collieston Coast	81.3-99.3	64.7-78.2	1.1-1.4	1.35-1.7%	0.857-0.828	0.884-0.862	AEoSI
East Caithness Cliffs	294.3-412.7	263.6-371.6	1.2-1.6	0.4%	0.774-0.698	0.795-0.723	AEoSI
Forth Islands	68.2-90.0	32.1-46.8	0.14-0.18	0.2%	0.683-0.597	0.836-0.770	Unable to conclude No AEoSI, but contribution from project is minimal
Fowlsheugh	201.1-253.4	92.0-123.0	0.7-0.9	0.35%	0.735-0.680	0.869- 0.829	AEoSI
North Caithness Cliffs	47.3-62.7	39.7-52.5	0.2-0.3	0.42-0.48%	0.832-0.787	0.857-0.819	Unable to conclude No AEoSI, but contribution from project is minimal
St Abbs Head to Fast Castle	334.1-402.7	21.4-31.2	0.1-0.2	0.03-0.04%	0.209-0.146	0.907-0.865	Unable to conclude No AEoSI, but contribution from project is minimal
Troup, Pennan and Lion's Head	76.4-103.7	62.3-85.3	0.9-1.1	1.06-1.17%	0.858-0.811	0.883-0.843	AEoSI

West Westray	50.6-66.4	41.7-54.4	0.12-0.3	0.4%	0.674-0.598	0.723-0.655	Unable to conclude No AEoSI, but contribution from project is minimal
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*The percentage contribution to in-combination effects range covers in-combination effects both with and without Berwick Bank OWF.

Conclusion

We conclude AEOI for the kittiwake feature at Buchan Ness to Collieston Coast, Troup, Pennan and Lion's Head, East Caithness Cliffs and Fowlsheugh SPAs, for in-combination impacts with and without Berwick Bank OWF.

For Forth islands, North Caithness Cliffs, St Abb's Head to Fast Castle and West Westray SPAs, while from the CPS values and population status we cannot conclude no AEOI, we consider that the project contribution to the in-combination impacts, with and without Berwick Bank OFW, do not make a tangible contribution to the impacts.

Guillemot

CPS in-combination values for guillemot, after 35 years, using our approach, are of concern at East Caithness Cliffs and Fowlsheugh SPAs and slightly below at Buchan Ness to Collieston Coast, North Caithness Cliffs and Troup, Pennan and Lion's Head SPAs.

We note that, for all these sites, the CPS values using the applicant's approach are above 0.95.

The project contribution to the additional mortality is high at Buchan Ness to Collieston Coast and Troup, Pennan and Lion's Head SPA. For the other SPAs the additional mortality from the project alone is considerably less.

At all sites except Troup, Pennan and Lion's Head SPA, the guillemot feature is in favourable condition. At Troup, Pennan and Lion's Head SPA the feature is in unfavourable condition. Seabird Count data shows significantly declining populations at North Caithness Cliffs and Troup, Pennan and Lion's Head SPAs, and a slight decline at East Caithness Cliffs SPA. Populations at the other sites are relatively stable.

Table 2: Assessment of in-combination impacts on guillemot

SPA	Predicted mortality in-combination with Berwick Bank (birds per annum)	Predicted mortality in-combination without Berwick Bank (birds per annum)	Predicted mortality from Green Volt (birds per annum)	Percentage contribution to in-combination effects*	CPS (with Berwick Bank)	CPS (without Berwick Bank)	Determination of AEoSI
Buchan Ness to Collieston Coast	35.4-68.8	25.8-47.3	15.9-28.2	40-61%	0.969-0.941	0.997-0.956	No AEoSI
East Caithness Cliffs	647.5-1128.7	647.5-1128.7	29-60	4.5-5.3%	N/A	0.877-0.795	AEoSI
Fowlsheugh	433.1-808.5	173.2-335.2	2.9-8.6	0.67-2.25%	0.829-0.705	0.928-0.865	AEoSI with BB. Potential for AEoSI without Berwick Bank.
North Caithness Cliffs	61.7-121.5	61.7-121.5	6.7-16.4	10.8-13.5%	N/A	0.954-0.910	No AEoSI
Troup, Pennan and Lion's Head	28.6-59.3	23.4-48.2	6.3-11.8	19-26.9%	0.964-0.925	0.971-0.941	No AEoSI

*The percentage contribution to in-combination effects range covers in-combination effects both with and without Berwick Bank OWF.

Conclusion

We consider that the CPS values at East Caithness Cliffs SPA (with and without Berwick Bank OFW, and Fowlsheugh SPA (with Berwick Bank), are sufficiently low to conclude AEOI for the guillemot feature at these sites. At Fowlsheugh SPA, without Berwick Bank, we consider there is potential for AEOI.

At Buchan Ness to Collieston Coast, North Caithness Cliffs and Troup, Pennan and Lion's Head SPAs the CPS values are not low enough to be of concern and we can conclude no AEOI for the guillemot features at these SPAs.

Razorbill

CPS in-combination values for razorbill, after 35 years, using our approach, are of concern at three sites.

The feature is in favourable condition at all three sites, with increasing populations at East Caithness Cliffs and Fowlsheugh SPAs, but a slightly declining population at Troup, Pennan and Lion's Head SPA.

The project contribution is very low for Fowlsheugh SPA at 0.004%, low for East Caithness Cliff SPA, but a little higher for Troup, Pennan and Lion's Head SPA.

Table 3: Assessment of in-combination impacts on razorbill

SPA	Predicted mortality in-combination with Berwick Bank (birds per annum)	Predicted mortality in-combination without Berwick Bank (birds per annum)	Predicted mortality from Green Volt (birds per annum)	Percentage contribution to in-combination effects*	CPS (with Berwick Bank)	CPS (without Berwick Bank)	Determination of AEoSI
East Caithness Cliffs	115.5-232.6	110.2-217.8	2.5-4.2	1.9-2.3%	0.885-0.782	0.890-0.794	AEoSI
Fowlsheugh	57.3-106.8	44.6-83.8	0.001-0.004	0.002-0.004%	0.879-0.785	0.904-0.827	Unable to conclude No AEoSI, but contribution from project is minimal
Troup, Pennan and Lion's Head	6.7-16.9	5.3-13.6	0.7-1.2	7.1-13.2%	0.955-0.889	0.964-0.909	No AEoSI

*The percentage contribution to in-combination effects range covers in-combination effects both with and without Berwick Bank OWF.

Conclusion

We consider that the CPS values at East Caithness Cliffs SPA (with and without Berwick Bank OWF), are sufficiently low to conclude AEOsI for the razorbill feature at these sites. For Fowlsheugh SPA we are unable to conclude no AEOsI, but the project contribution is low (less than or around 1 bird per annum) and as such does not make a tangible contribution to the impacts.

Puffin

CPS in-combination values for puffin, after 35 years, using our approach, of concern at one site, Forth Islands SPA. The CPS was very low both with and without Berwick Bank but the project contribution to the additional mortality was very small.

Table 4: Assessment of in-combination impacts on puffin

SPA	Predicted mortality in-combination with Berwick Bank (birds per annum)	Predicted mortality in-combination without Berwick Bank (birds per annum)	Predicted mortality from Green Volt (birds per annum)	Percentage contribution to in-combination effects*	CPS (with Berwick Bank)	CPS (without Berwick Bank)	Determination of AEoSI
Forth Islands	159.8-266.3	141.61-236.1	0.4-0.8	0.25-0.33%	0.504-0.327	0.550-0.372	Unable to conclude No AEoSI, but contribution from project is minimal

*The percentage contribution to in-combination effects range covers in-combination effects both with and without Berwick Bank OWF.

Conclusion

From the CPS values and population status for puffin at Forth Islands SPA we are unable to conclude no AEoSI. However, we consider that the project contribution to the in-combination impacts can be classed as extremely low and as such does not make a tangible contribution to the impacts.

Gannet

CPS in-combination values for gannet, after 35 years, using our approach, are low at Forth Islands SPA, but less so at Hermaness, Saxa Vord & Valla Field SPA, both with and without Berwick Bank.

The gannet feature at both sites is in favourable condition with increasing populations, but they have been heavily impacted by HPAI.

The project contribution to the additional mortality is low at both sites.

Table 5: Assessment of in-combination impacts on gannet

SPA	Predicted mortality in-combination with Berwick Bank (birds per annum)	Predicted mortality in-combination without Berwick Bank (birds per annum)	Predicted mortality from Green Volt (birds per annum)	Percentage contribution to in-combination effects*	CPS (with BB)	CPS (without BB)	Determination of AEOI
Forth Islands	835.9-1122.4	652.7-877.1	5.8-7.6	0.86-1.03%	0.788-0.727	0.883-0.782	AEOI
Hermaness, Saxa Vord & Valla Field	76.8-105.5	74.2-101.4	0.99-1.2	1.12-1.3%	0.938-0.915	0.939-0.919	No AEOI

*The percentage contribution to in-combination effects range covers in-combination effects both with and without Berwick Bank OWF.

Conclusion

The CPS values at Hermaness, Saxa Vord & Valla Field SPA are not low enough to be of concern and the project contribution is very low, so we can conclude no AEOsI, even though the gannet population has been affected by HPAI.

For Forth Islands SPA the CPS values are significantly low and the project contribution is up to 7.6 birds per annum. Due to this, coupled with impacts from HPAI, we advise AEOsI for gannet at this site.

Overarching Conclusion

Based on our assessment above we consider that there are adverse impacts from in-combination effects both with and without Berwick Bank for certain SPAs/protected features and therefore further consideration is required as part of the HRA process.

NatureScot ADVICE FOR GREEN VOLT OFFSHORE WIND FARM – ADDITIONAL INFORMATION

APPENDIX B – OFFSHORE ORNITHOLOGY COMPENSATION MEASURES REPORT

We have reviewed the Green Volt Offshore Ornithology Compensation report (FLO – GRE – REP – 0025) and provide advice below.

We note that this report has been prepared without prejudice and as requested by Marine Directorate due to concerns around potential in-combination effects on European Site ornithological protected features. Our advice contained in Appendix A indicates that we consider that the project alone does not adversely impact any European Site. However, in combination with other windfarms (both with and without the proposed Berwick Bank Offshore Windfarm application), we advise that there are a number of European Site protected features where we conclude an adverse effect on site integrity.

We welcome both the reference material used to inform this report as well as the step wise process undertaken to identify both a long list and short list of compensation measures.

Since the submission of the additional information the Seabirds Count⁴ census has become available. The Seabirds Count census and more recent colony counts are indicating longer term changes and, in most cases, declines to breeding seabird populations in Scotland. Some of this decline relates to continuing trends whilst the outbreak of Highly Pathogenic Avian Influenza (HPAI) has further contributed to this decline and it is unclear the longer term effects of HPAI. It is therefore vital that actions are taken to address and, where possible, reverse these declines.

The applicant acknowledges the preferred hierarchal approach for the identification of compensation measures. They also mention the UK Energy Act and the potential for a Marine Recovery Fund.

Potential compensation measures

The applicant has identified a long list of measures which, based on their described set of criteria, they have scored and shortlisted to the following list of three measures:

1. Strategic – Strategic Funding;
2. Reduced anthropogenic impacts – Disturbance reduction at SPAs; and
3. Habitat modification – Reinstatement of habitat, management of invasives, scrub clearance or similar.

The report, however, indicates that none of the above measures have been progressed but identifies the next steps that would be taken, if required to be progressed. There is, therefore, considerable doubt on the practical implementation of any of these measures currently with no real detail provided. If the project is considered for consent then further additional work will be required to ensure the implementation of compensation measures. This is dependent on whether the appropriate assessment concludes an adverse effect on site integrity to any of the SPA protected features assessed, based on our advice and / or additional Marine Directorate assessment.

⁴ <https://jncc.gov.uk/our-work/seabirds-count/>

Northern Lighthouse Board

From: [Adam Lewis](#) on behalf of [navigation](#)
To: [MD Marine Renewables](#)
Subject: RE: [EXT] Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023
Date: 06 November 2023 13:34:54
Attachments: [image001.png](#)
[image002.png](#)

Good afternoon,

NLB have no comment to provide with regard to the additional information provided below.

Regards

Adam

Adam Lewis
Coastal Inspector



Ofcom

From: [Spectrum Licensing](#)
To: [MD Marine Renewables](#)
Subject: Green Volt Offshore Wind Farm - Additional Information Application Consultation
Date: 03 November 2023 13:00:34



Dear Sir / Madam,

Thank you for contacting us.

Please note that Ofcom no longer provides a dedicated windfarm co-ordination facility.

Instead, stakeholders can now access Ofcom licence information via the Ofcom Spectrum Information System (SIS).

The SIS includes licence data for UK fixed links that are assigned and co-ordinated by Ofcom.

When using the SIS it should be noted that, there are a number of frequency bands that are now authorised on a block basis i.e. these bands are managed and assigned by the licensees themselves and the individual link information for these bands (where a band is being used for fixed links) is not held in Ofcom's licensing and assignment database nor published on the SIS. Our website has further information on these bands and the licensees details.

In addition Scanning Telemetry links, used by the utilities and other services (operating in the bands 457.5 – 458.5 MHz & 463 – 464 MHz), are managed externally by Atkins Limited and the Joint Radio Company (JRC), who can be contacted as follows:

Atkins Limited
200 Broomielaw
Glasgow
G1 4RU
Email: windfarms@atkinsglobal.com

JRC (Joint Radio Company)
Friars House
Manor House Drive
Coventry
CV1 2TE
Email : windfarms@jrc.co.uk
Website: www.jrc.co.uk/what-we-do/wind-farms

Please contact us if you need any further assistance.

Yours sincerely,

Ofcom Spectrum Licensing
Spectrum.licensing@ofcom.org.uk

ref:!00D580H42o.!5004I01bRAZD:ref

RSPB

Marine Scotland Licensing Operations Team
Marine Scotland
By email: MS.MarineRenewables@gov.scot



16th January 2024

Dear Lauren,

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989, MARINE LICENCES UNDER PART 4 OF THE MARINE (SCOTLAND) ACT 2010 AND MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE GREEN VOLT OFFSHORE WINDFARM, EAST OF ABERDEENSHIRE COAST.

Thank you for consulting RSPB Scotland on the revised information on above application to construct and operate an offshore windfarm off the Aberdeenshire Coast. We previously raised an objection to the application due to concerns about the manner in which the assessment has been carried out. This prevented us from reaching a conclusion on the significance of impacts.

The additional information provides a more comprehensive picture, and we are grateful it has been clearly structured as this greatly aids our reviewing of it. Our reviewing has however been hindered by the labelling of tables in the PVA section which do not make clear whether collision has been included. Due to staff time constraints we have been unable to fully interrogate model methods, inputs, and outputs. In making these comments we therefore assume the models have been carried out using the correct parameters and that the word 'collision' has been omitted from the PVA Results table descriptions.

We fundamentally disagree with the argument that variable natural mortality makes additional mortality associated with development acceptable. This is the main argument presented by the applicant in rejecting adverse effect on site integrity (AEoSI). Seabirds are relatively long-lived, take longer to reach breeding age than most other birds and have just one or two young per year. As a result, their populations are sensitive to small increases in adult mortality. The predicted additional mortality occurs in addition to the natural variable mortality – so where a species is already declining, this can have particularly severe consequences.

Seabirds are under severe pressure. In 2019 they were assessed as moving away from target to achieve Good Environmental Status. More recently, the fourth census of Britain and Ireland's internationally important populations of breeding seabirds¹ shows that of the 20 species for which we have confidence in their Scottish trends, 14 have declined. Just three species have remained stable but two of these – Great Skua and Northern Gannet - are known to have been significantly impacted by Highly Pathogenic Avian Influenzas after

¹ <https://jncc.gov.uk/our-work/seabirds-count/>

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the census took place. Additional mortality must be considered in the context of these current population trends. Furthermore, Kittiwake, Gannet and Puffin are red listed in the Birds of Conservation Concern whilst Guillemot are Amber listed. Impacts to them should not be treated lightly.

When considered in isolation we do not consider the proposed development poses unacceptable impacts to seabirds. In combination with other developments however, we are deeply concerned - particularly with regard to puffin, kittiwake, gannet, and guillemot. An underestimation of impacts of previously consented development has substantial repercussions when consenting later offshore wind development. This accentuates the importance of taking a precautionary approach to reduce the likelihood of irreversible damage occurring whilst our knowledge base is incomplete. **Due to the scale of predicted impacts in cumulation with other projects we object to the proposed development.**

Summary of impacts

Puffin

Using SNCB advocated methods, the impacts arising from distributional change associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, not including Berwick Bank Offshore Wind Farm, are predicted to result in the annual population growth rate of puffin at the Forth Islands SPA declining, with a ratio of impacted to unimpacted population growth rate of between 0.973 and 0.984. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **37.2% and 55.0%** of what it would have been in the absence of the development. If the Berwick Bank Offshore windfarm is included, the population sizes are expected to decrease further to between **32.7% and 50.4%** of what it would have been in the absence of the development. As such, **RSPB Scotland consider potential AEOI cannot be ruled out for puffin at the Forth Islands SPA**

Kittiwake

Using SNCB advocated methods, the impacts arising from distributional change and collision associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, not including Berwick Bank Offshore Wind Farm, are predicted to result in the annual population growth rate of kittiwake at the St Abb's Head to Fast Castle SPA declining, with a ratio of impacted to unimpacted population growth rate of between 0.997 and 0.996. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **86.5% and 90.7%** of what it would have been in the absence of the development. If the Berwick Bank Offshore windfarm is included, the population sizes are expected to decrease further to between **14.6% and 20.9%** of what it would have been in the absence of the development. As such, **RSPB Scotland consider potential AEOI cannot be ruled out for kittiwake at the St Abb's Head to Fast Castle SPA particularly if Berwick Bank Offshore Windfarm is also consented.**

Using SNCB advocated methods, the impacts arising from distributional change and collision associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, not including Berwick Bank Offshore Wind Farm, are predicted to result in the annual population growth rate of kittiwake at the East Caithness Cliffs SPA declining, with a ratio of impacted to unimpacted population growth rate of

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between 0.991 and 0.993. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **72.3% and 79.5%** of what it would have been in the absence of the development. If the Berwick Bank Offshore windfarm is included, the population sizes are expected to decrease further to between **69.8% and 77.4%** of what it would have been in the absence of the development. As such, **RSPB Scotland consider potential AEOsI cannot be ruled out for kittiwake at the East Caithness Cliffs SPA**

Using SNCB advocated methods, the impacts arising from distributional change and collision associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, not including Berwick Bank Offshore Wind Farm, are predicted to result in the annual population growth rate of kittiwake at the Forth Islands SPA declining, with a ratio of impacted to unimpacted population growth rate of between 0.993 and 0.995. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **77.0% and 83.6%** of what it would have been in the absence of the development. If the Berwick Bank Offshore windfarm is included, the population sizes are expected to decrease further to between **59.7% and 68.3%** of what it would have been in the absence of the development. As such, **RSPB Scotland consider potential AEOsI cannot be ruled out for kittiwake at the Forth Islands SPA**

Using SNCB advocated methods, the impacts arising from distributional change and collision associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, not including Berwick Bank Offshore Wind Farm, are predicted to result in the annual population growth rate of kittiwake at the Fowlsheugh SPA declining, with a ratio of impacted to unimpacted population growth rate of between 0.995 and 0.996. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **71.3% and 86.9%** of what it would have been in the absence of the development. If the Berwick Bank Offshore windfarm is included, the population sizes are expected to decrease further to between **68.0% and 73.5%** of what it would have been in the absence of the development. As such, **RSPB Scotland consider potential AEOsI cannot be ruled out for kittiwake at Fowlsheugh SPA**

Using SNCB advocated methods the impacts arising from distributional change and collision associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, not including Berwick Bank Offshore Wind Farm, are predicted to result in the annual population growth rate of kittiwake at the West Westray SPA declining, with a ratio of impacted to unimpacted population growth rate of between 0.988 and 0.991. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **65.5% and 72.3%** of what it would have been in the absence of the development. If the Berwick Bank Offshore windfarm is included, the population sizes are expected to decrease further to between **59.8% and 67.4%** of what it would have been in the absence of the development. As such, **RSPB Scotland consider potential AEOsI cannot be ruled out for kittiwake at West Westray SPA**

Using SNCB advocated methods the impacts arising from distributional change and collision associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, not including Berwick

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Bank Offshore Wind Farm, are predicted to result in the annual population growth rate of kittiwake at the Buchan Ness to Collieston Coast SPA declining, with a ratio of impacted to unimpacted population growth rate of between 0.997 to 0.997. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **86.2% to 88.4%** of what it would have been in the absence of the development. If the Berwick Bank Offshore windfarm is included, the population sizes us expected to decrease further to between **82.8% and 85.7%** of what it would have been in the absence of the development. As such, **RSPB Scotland consider potential AEOsI cannot be ruled out for kittiwake at Buchan Ness to Collieston Coast SPA**

Using SNCB advocated methods the impacts arising from distributional change and collision associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, not including Berwick Bank Offshore Wind Farm, are predicted to result in the annual population growth rate of kittiwake at the Troup, Pennan and Lion's Head SPA declining, with a ratio of impacted to unimpacted population growth rate of between 0.995 and 0.997. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **84.3% and 88.3%** of what it would have been in the absence of the development. If the Berwick Bank Offshore windfarm is included, the population sizes us expected to decrease further to between **81.1% and 85.8%** of what it would have been in the absence of the development. As such, **RSPB Scotland consider potential AEOsI cannot be ruled out for kittiwake at Troup, Pennan and Lion's Head SPA.**

Guillemot

Using SNCB advocated methods, the impacts arising from distributional change associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, not including Berwick Bank Offshore Wind Farm, are predicted to result in the annual population growth rate of guillemot at the Fowlsheugh SPA declining, with a ratio of impacted to unimpacted population growth rate of between 0.996 and 0.998. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **86.5% and 92.8%** of what it would have been in the absence of the development. If the Berwick Bank Offshore windfarm is included, the population sizes us expected to decrease further to between **70.5% and 82.9%** of what it would have been in the absence of the development. As such, **RSPB Scotland consider potential AEOsI cannot be ruled out for guillemot at the Fowlsheugh SPA**

Using SNCB advocated methods, the impacts arising from distributional change associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, are predicted to result in the annual population growth rate of guillemot at the East Caithness Cliffs SPA declining, with a ratio of impacted to unimpacted population growth rate of between 0.994 and 0.996. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **79.5% and 87.7%** of what it would have been in the absence of the development. As such, **RSPB Scotland consider potential AEOsI cannot be ruled out for guillemot at the East Caithness Cliffs SPA**

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Gannet

Using SNCB advocated methods, the impacts arising from distributional change and collision associated with the presence of Green Volt Offshore Wind Farm in combination with other projects, not including Berwick Bank Offshore Wind Farm, are predicted to result in the annual population growth rate of gannet at the Hermaness, Saxa Vord and Valla Field SPA declining, with a ratio of impacted to unimpacted population growth rate of 0.998. This means that after the 35-year lifetime of Green Volt Offshore Wind Farm, the population size of the SPA is expected to be between **91.9% and 93.9%** of what it would have been in the absence of the development. There is little difference to these predictions if the Berwick Bank Offshore windfarm is included. **Mindful of the recent impact of HPAI to gannet in Scotland, RSPB Scotland consider potential AEOI cannot be ruled out for gannet at the Hermaness, Saxa Vord and Valla Field SPA.**

Conclusion

An AEOI means potential effects from the development that are likely to prevent the achievement of the site's conservation objectives and cannot be mitigated. European sites are the most important sites for wildlife and as such it is right that maintaining them in favourable conservation status and protecting them from development carries a high weight in decision making.

Under the Habitats Regulations, a project that would result in AEOI on European protected sites cannot be permitted unless it can be demonstrated there are no lesser damaging alternative solutions, there are imperative reasons of overriding public interest (IROPI) for the project to go ahead, and compensation to maintain the coherence of the UK/National Sites Network can be secured.

We have reviewed the Compensation Report and the three shortlisted measures. These are:

- Strategic – Strategic funding Disturbance reduction at SPAs;
- Reduced anthropogenic impacts – Disturbance reduction at SPAs; and
- Habitat modification – Reinstatement of habitat, management of invasives, scrub clearance or similar.

Although we welcome reducing disturbance at SPAs and agree there are benefits of well managed invasive scrub clearance works, mindful of SPA objectives and existing obligations, RSPB Scotland have concerns around the additionally aspect of these proposed measures. As acknowledged in the table of measures, a large area of uncertainty is also identifying suitable sites for such works. We are also concerned that the proposed measures do not target the species impacted by the proposed development. Overall, further work is required for these proposed compensation measures to be taken forwards and for the tests of the Habitats Regulations to be met. At this point in time, the application cannot be permitted.

Should you require any further information or clarification, please do not hesitate to contact RSPB Scotland.

Yours sincerely,

Catherine Kelham

Senior Marine Conservation Planner
RSPB Scotland

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**Scottish Environment Protection
Agency**

From: [Planning.North](#)
To: [MD Marine Renewables](#)
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023
Date: 06 November 2023 15:36:59
Attachments: [image001.png](#)
[image003.png](#)

OFFICIAL

Dear Kate

Thank you for your consultation, which SEPA received by email on 3 November 2023.

The additional information submitted does not fall within our remit to review and therefore we will not be formally responding to this consultation.

If there is something specific not adequately covered by our standing advice to marine license consultations, then please re-consult us specifying what advice you require.

Regards

Zoe Griffin
Senior Planning Officer
Planning Service
Scottish Environment Agency (SEPA)
Email: planning.north@sepa.org.uk

Please note my normal working hours are currently Tuesday, Wednesday and Thursday 9:00am-4:30pm, Mondays 1.30-5.00pm

ADVANCED NOTICE OF OUT OF THE OFFICE AND LEAVE – 21-24 November inclusive

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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk. Oifis chlàraichte: Taigh Srath Alain, Pàirc Gnothachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm.

Scottish Fishermen's Federation



Our Ref: MF-GVOWF/23-002

Your Ref: Email dated 3rd November 2023

09 January 2024

E-mail: MD.MarineRenewables@gov.scot

Scottish Fishermen's Federation
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Aberdeen, AB10 1XE
Scotland UK

T: +44 (0) 1224 646944
F: +44 (0) 1224 647078
E: sff@sff.co.uk

www.sff.co.uk

Dear Kate,

Green Volt Offshore Wind Ltd – Additional Information Application Consultation

The Scottish Fishermen's Federation is pleased to respond to this additional information application on behalf of the 450 plus fishing vessels in membership of its constituent associations, The Anglo Scottish Fishermen's Association, Fife Fishermen's Association, Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association. The Chair of the NECrIFG has been consulted and agrees with this paper.

Throughout the paper, for simplicity, where it states the SFF objects, that means all of the above-named organisations.

This is to reiterate that the response that SFF had submitted on the license application in March 2023, remains valid.

SFF notes from section 4.4 Potential Compensation Measures, of the Offshore Ornithology Compensation Measures Report that the Applicant has proposed some compensation measures to offset the possible impact of the development on birds including the following points and SFF would like to comment on the proposed points as follows:

- 1. '5a. Increase in prey availability – Cessation of sandeel and sprat fishing in UK waters, and 5b. Increase in prey availability – No-take zones for fish prey'**

In terms of measures 5a., and 5b., SFF objects any measures that impose fishing restrictions for its members therefore is contend with these measures. While we acknowledge that the government has its own agenda on sandeel fisheries, we would argue that its cessation should not be related to the offsetting of the damage on seabird created by the windfarm therefore we keep opposing the principle of the so-called shadow derogations.

- 2. '8. Habitat creation - Provision of artificial nesting structures'**

In terms of '8. Habitat creation' SFF would be content if the structures are built on the existing wind turbines/platforms but we object to construction of any new structures in open water where fishing activities take place since these structures would create a snagging and navigation hazards for the fishing industry. In addition, depending on the practical implementation of this idea, we believe that this would further burden on spatial squeeze, in particular if safety zones around these nesting structures would have to be implemented.

3. '3b. Reduced anthropogenic impacts – Bycatch reduction'

On the specifics of 3b. By-catch reduction – SFF believes that there are so many initiatives that are and will be ongoing for tackling the by-catch issue that we do not think this is something that it can be clustered as emerging from this process as a compensatory measure. Direct by-catch mitigation (catching birds directly via different fishing methods) is a problem that is not of the Scottish fleet but for those foreign fleets operating in our waters a lot of things are ongoing to mitigate the problem as much as possible and this is not at all related to any windfarm coming in. This is just a redundant rebadging of something that is already on the go.

4. '4. Habitat enhancement – Seagrass restoration'

In terms of '4. Habitat enhancement – Seagrass restoration' again this is something that is already considered under other umbrella, including SG's strategy to enhance biodiversity. While we are open to dialogue with the government on the where, when, and how much should be proceeding on this line, we have the feeling that the proposal from the windfarm project risks stepping into Government led processes and policies and if delegated to windfarm developers for compensatory measures purposes it only risks creating a much more complex framework to operate in.

Embedded mitigations are not to build an offshore windfarm if there is a clear alternative to achieve the same outcome. Since there is a clear alternative to constructing and operating an offshore windfarm of commercial size to decarbonise the oil and gas assets (power from the grid) therefore a shadow derogation would not be required.

In conclusion, SFF stresses that our primary concern is protecting the rights of fishermen to safely undertake their trade, and this is the cornerstone of our response. Our position is that fishing activities should continue unaffected and unharmed post-development. If fishermen impacted are to be denied the right to earn their living, we could not support the development of any proposal for a windfarm.

Yours sincerely

Mohammad Fahim Hashimi
Offshore Energy Policy Manager
Scottish Fishermen's Federation

The Royal Yachting Association

From: [Pauline McGrow](#)
To: [SD Marine Renewables](#)
Subject: RE: Green Volt Offshore Wind Farm - Additional Information Application Consultation - Response required by 18 December 2023
Date: 12 December 2023 10:16:40
Attachments: [image004.png](#)
[image005.png](#)
[image001.png](#)

Hi Kate,

I write to inform you that RYA Scotland has no comment that they wish to make on this application.

Kind Regards

Pauline

Pauline McGrow
Senior Administrator
Mob: [REDACTED]

Royal Yachting Association Scotland
[REDACTED]
E: pauline.mcgrow@ryascotland.org.uk



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Transport Scotland

From: [Iain Clement](#)
To: [MD Marine Renewables](#)
Cc: llogan@systra.com; [Andrew Erskine](#); [DEVENNY Alan](#)
Subject: Green Volt Offshore Wind Farm - Additional Information Application Consultation - TS Response - 5-Dec-23
Date: 05 December 2023 15:33:19
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

FAO Kate Taylor

Afternoon Kate,

Thank you for the opportunity for Transport Scotland to comment on the Additional Information (AI) submitted in support of the application to construct and operate the Green Volt Offshore Wind Farm and associated offshore transmission infrastructure located east of the Aberdeenshire coast.

Transport Scotland was consulted on the Environmental Impact Assessment Report (EIAR) for this proposal and provided comment in an email dated 6th March 2023. In this, we noted that the EIAR was for the Offshore components only and that a separate EIAR for the Onshore infrastructure would be submitted separately. Consequently, Transport Scotland was satisfied at that time that any potential impact on the Trunk Road network associated with the onshore element would be identified within the forthcoming onshore EIAR, and we had no comment to make on the offshore EIAR.

Having reviewed the AI, we note that this has been submitted following requests made by consultees during the consultation period for the offshore EIAR and comprises a Supplementary Ornithological Assessment, a Habitats Regulations Appraisal Derogation Case and an Offshore Ornithology Compensation Measures Report. As this information has no bearing on potential impacts on the trunk road network, I can confirm that Transport Scotland has no further comment to make on this.

I trust this information is satisfactory. Should you require any further information, please do not hesitate to contact me.

Kind regards,

Iain

Development Management
Network Operations
Roads Directorate
transport.gov.scot

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Transport Scotland, the national transport agency
Còmh dhail Alba, buidheann nàiseanta na còmhdhail

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